

STIPULATED TESTIMONY OF JOHN P. ALLEN

John P. Allen, under penalty of perjury, declares that the following is true and correct to the best of his knowledge:

1. I am a professional aeronautical consultant. My qualifications are a matter of record in the FCC's files.

2. In February 1992 I was retained by Glendale Broadcasting Company ("Glendale") to perform an aeronautical study on its proposed 1,124 foot tower located at coordinates 33° 46' 17" NL, 84° 00' 25" WL. On February 19, 1992 I filed a Notice of Proposed Construction or Alteration for Glendale's proposed tower with the Federal Aviation Administration ("FAA"). Because Glendale's proposed tower was over 500 feet high above ground, at that time I requested that an aeronautical study be conducted.

3. In mid-September 1992 I received a call from Robert Shipp of the FAA, who informed me that the comments received as part of the aeronautical study involving Glendale's proposed construction had alleged the existence of a Visual Flight Rules ("VFR") route near the proposed tower. A VFR route is a route used by pilots who are navigating by visual landmarks. There was no way for me to determine the existence of that VFR route when I filed the Notice of Proposed Construction or Alteration with the FAA in February 1992. Because there is no map or other documents which show the location of VFR routes, I asked the FAA to perform a radar study to determine whether the alleged VFR route actually existed. The FAA performed such a study, which concluded that the VFR route did exist.

Federal Communications Commission

Docket No. 93-156 Exhibit No. Jt. 2

Presented by Glendale

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Reporter AW

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4. In subsequent discussions with Mr. Shipp of the FAA, I attempted to persuade him that the FAA should approve the proposed tower because it would have no greater effect on the VFR route than the existing 1,149 foot tower which was used by Trinity Broadcasting Network ("Trinity"). The FAA rejected that argument because it was concerned about the existence of a "goal post" where planes using the VFR route would have to fly in-between the Trinity tower and Glendale's proposed tower. Mr. Shipp told me the FAA would issue a determination of hazard to air navigation unless Glendale moved its tower to a new location aligned so that the two towers would form a line parallel to the VFR route on a northwest or southeast direction. At no time, however, was any consideration given to the FCC's requirements regarding channel spacing.

5. If Glendale had attempted to propose a new tower site more than one mile from its original site or the Trinity tower, the FAA would have required Glendale to submit a new Notice of Proposed Construction or Alteration and would have conducted a new aeronautical study, including the solicitation and review of new comments from the aeronautical community. Such a study would have taken several months to complete, and there would always be a possibility that the FAA would reject the new tower construction proposal because of another VFR route or adverse comments from the aeronautical community. The only circumstances where no FAA notice or approval are required are: (1) when construction is done on an existing tower and there is no increase in the overall height of

202-785-8334 COHEN & BERFIELD PC

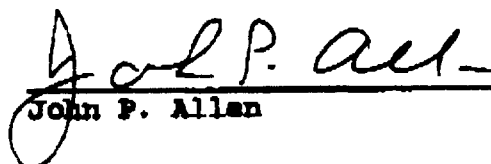
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the tower (such as a side-mounting of a new antenna); and (2) when the proposed tower is less than 200' above ground level.

6. On November 22, 1992, I notified the FAA that Glendale proposed an alternate tower site at coordinates 33° 44' 38" NL, 84° 00' 39" WL with a tower 1,089 feet above ground. This site is approximately one-half mile northwest of Trinity's existing tower. On December 16, 1992, the FAA issued a Determination of No Hazard to Air Navigation for that proposed tower. The FAA's determination became final on January 25, 1993.

7. At no time during my engagement by Glendale was I ever directed to locate an antenna site or tower where Glendale might construct its proposed facility for channel 63, Monroe, Georgia. I have no knowledge of the criteria used by the FCC in evaluating applications submitted to it, nor do I have any knowledge of its channel spacing requirements, and at no time did I render any advice to Glendale on whether its proposal complied with the FCC's requirements.

Dated: May 16, 1994


John P. Allen

STIPULATED TESTIMONY OF GREGORY B. DALY

Gregory B. Daly, under penalty of perjury, declares that the following is true and correct to the best of my knowledge:

1. I am owner of Telecommunications Site Acquisition, Inc. ("TelSA"). TelSA is a company that assists clients in site related tasks, including the location of antenna sites for applicants before the Federal Communications Commission ("Commission"). I have been involved in locating sites for applicants before the Commission since 1983, and I have located over 5,000 such sites.

2. In January 1992 Mr. Lewis Cohen, on behalf of Glendale Broadcasting Company ("Glendale"), retained my services to locate a transmitter site for an application Glendale wanted to file for a television station, channel 63, at Monroe, Georgia. I was informed that Glendale's application would be mutually exclusive with the application for Trinity Broadcasting Network ("Trinity"), licensee of WHSG(TV), Monroe, Georgia.

3. John J. Mullaney of Mullaney Engineering, Inc., Glendale's consulting engineer, gave me instructions for locating a site for this facility. Mr. Mullaney provided me with a map of the area showing the location of the tower site owned and used by Trinity. Mr. Mullaney also identified on that map the area where an antenna tower site for channel 63, Monroe, could be located in order to be fully separated under the rules of the FCC from an educational channel 63 allocation in Montgomery, Alabama. My instructions from Mr. Mullaney, however, were to find a piece of property approximately 16 to 31 acres in size as close as possible

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to Trinity's existing tower, not in the area identified where a fully spaced site could be located.

4. Mr. Mullaney also instructed me that the site should not be southwest of Trinity's existing tower because he did not want to increase the short-spacing that already existed between Trinity's station and the vacant allotment for channel 63, Montgomery, Alabama. Mr. Mullaney never told me to look for a site that was fully spaced to the Montgomery allocation, and I never did.

5. In late January and early February 1992, I travelled to Georgia to locate a site for Glendale. I searched in the area that Mr. Mullaney instructed me to search in. I reviewed land records in three different counties. I spent five days searching for an available and suitable site. I attempted to contact most or all of the land owners whose parcels were large enough to accommodate Glendale's acreage requirements.

6. I found three land owners with parcels of land large enough to accommodate Glendale's proposed tower who were willing to provide reasonable assurance of site availability. I rejected one of the three sites as unsuitable because it was too close to an airport. The second site was rejected because the land owner wanted \$800,000, or two to three times the market value of the property, for his land. I selected the third site, which was owned by Martha Day Bryant, which was suitable. Glendale's original application specified the Bryant property as its transmitter site.

7. In the fall of 1992, Mr. Mullaney informed me that the Federal Aviation Administration ("FAA") had rejected the Bryant

site. As a result, I was again retained by Glendale to locate another transmitter site. Mr. Mullaney instructed me that to obtain FAA approval, the site was to be located as close as possible to Trinity's tower (preferably no more than 2,000 feet from Trinity's tower) and either northwest or southeast of that tower. I was not instructed to search for a fully spaced site, and I made no investigation for a site that was fully spaced to the Montgomery, channel 63 allocation.

8. The only available site I could locate which met the search parameters given by Mr. Mullaney was a property owned by Clarence Hall. The Hall property was approximately one-half mile northwest of Trinity's tower. It is my understanding that the FAA approved Glendale's tower at the Hall site.

9. At no time did I ever advise Glendale, or any of its agents or representatives, on compliance matters involving the rules and regulations of the FAA or the FCC.

Date: May 16, 1994

Gregory B. Daly
Gregory B. Daly

STIPULATION RE
PUBLIC SERVICE ANNOUNCEMENTS

Trinity Christian Center of Santa Ana, Inc. d/b/a Trinity Broadcasting Network (Trinity) and Glendale Broadcasting Company (Glendale) now stipulate as follows:

The program logs for WHSG(TV) indicate that the number of public service announcements (PSAs) listed below aired on WHSG(TV) during the renewal period. The chart lists the number of PSAs that ran during each week of the renewal period in the following lengths: 10 seconds, 15 seconds, 20 seconds, 30 seconds, one minute, and longer than 1 minute. For instance, the number 4 under the :30 column for the week 3/15/92 - 3/21/92 means that the four thirty second PSAs were aired during that week.

<u>Week</u>	<u>:10</u>	<u>:15</u>	<u>:20</u>	<u>:30</u>	<u>1:00</u>	<u>Longer than one minute</u>
3/29/92 - 3/31/92	0	0	0	0	1	0
3/22/92 - 3/28/92	0	0	2	0	1	0
3/15/92 - 3/21/92	0	0	0	4	0	0
3/8/92 - 3/14/92	0	1	2	4	2	0
3/1/92 - 3/7/92	0	1	2	5	2	0
2/23/92 - 2/29/92	0	1	1	5	4	0
2/16/92 - 2/22/92	0	1	0	6	2	0
2/9/92 - 2/15/92	0	1	3	7	1	0
2/2/92 - 2/8/92	0	1	2	5	1	0
1/26/92 - 2/1/92	0	0	0	6	1	1 3:10
1/19/92 - 1/25/92	0	1	2	7	5	1 3:00
1/12/92 - 1/18/92	0	1	4	10	6	0

Commission

93156 Exhibit No. 5t.4

Glendale

to be returned

Identified 5-17-94

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1/5/92 - 1/11/92	0	0	0	2	2	1 3:00
12/29/91 - 1/4/92	0	1	2	7	4	0
12/22/91 - 12/28/91	0	0	1	1	1	1 3:00
12/15/91 - 12/21/91	0	0	0	2	3	0
12/8/91 - 12/14/91	0	1	2	7	6	0
12/1/91 - 12/7/91	0	0	1	4	4	0
11/24/91 - 11/30/91	1	1	2	9	1	1 3:00
11/17/91 - 11/23/91	0	0	2	3	3	0
11/10/91 - 11/16/91	0	0	1	2	3	0
11/3/91 - 11/9/91	0	0	0	0	0	0
10/27/91 - 11/2/91	0	1	1	4	7	0
10/20/91 - 10/26/91	0	0	1	7	2	1 1:30
10/13/91 - 10/19/91	0	0	0	10	1	0
10/6/91 - 10/12/91	0	0	1	13	4	0
9/29/91 - 10/5/91	0	1	1	10	7	0
9/22/91 - 9/28/91	0	0	3	13	6	1 1:30
9/15/91 - 9/21/91	0	1	2	14	5	0
9/8/91 - 9/14/91	0	0	3	6	5	0
9/1/91 - 9/7/91	1	0	2	12	9	0
8/25/91 - 8/31/91	1	1	3	21	10	0
8/18/91 - 8/24/91	2	0	1	22	4	0
8/11/91 - 8/17/91	2	1	1	15	8	2 1:30
8/4/91 - 8/10/91	0	1	2	13	8	1 1:30
7/28/91 - 8/3/91	0	0	0	7	10	0
7/21/91 - 7/27/91	0	0	1	2	0	0
7/14/91 - 7/20/91	1	0	2	15	5	1 1:30
7/7/91 - 7/13/91	0	0	4	9	8	0
6/30/91 - 7/6/91	0	0	3	13	11	1 3:00
6/23/91 - 6/29/91	0	0	2	11	9	1 1:30
						1 3:00
6/16/91 - 6/22/91	0	0	4	8	9	1 1:30
6/9/91 - 6/15/91	0	1	2	18	6	1 3:00
6/2/91 - 6/8/91	0	1	2	14	8	1 1:30
5/26/91 - 6/1/91	0	0	1	20	14	0
5/19/91 - 5/25/91	0	0	4	8	9	0
5/12/91 - 5/18/91	0	0	4	11	5	0
5/5/91 - 5/11/91	1	1	3	16	10	1 1:30
4/28/91 - 5/4/91	0	0	5	12	9	0
4/21/91 - 4/27/91	0	0	2	7	7	0
4/14/91 - 4/20/91	1	0	2	10	4	0
4/7/91 - 4/13/91	1	1	0	7	5	1 1:30
3/31/91 - 4/6/91	0	0	0	0	0	0
3/24/91 - 3/30/91	0	0	0	5	3	0
3/17/91 - 3/23/91	0	1	1	6	8	1 1:30
3/10/91 - 3/16/91	0	1	1	10	4	0
3/3/91 - 3/9/91	1	0	1	8	6	0
2/26/91 - 3/2/91	1	0	2	14	10	0

**TRINITY CHRISTIAN CENTER OF SANTA ANA,
INC. d/b/a TRINITY BROADCASTING NETWORK**

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GLENDAL E BROADCASTING COMPANY

BY John J. Schauble
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**STIPULATION--TESTIMONY OF
SCOTT W. JACKSON**

Trinity Christian Center of Santa Ana, Inc. d/b/a Trinity Broadcasting Network (Trinity) and Glendale Broadcasting Company (Glendale) now stipulate that if Scott W. Jackson were called to testify, he would testify as follows:

1. Monroe, Georgia, the community of license of WHSG-TV, is located in Walton County, Georgia. Monroe is approximately thirty-five miles east of Atlanta, Georgia.

2. Mr. Jackson does not recall any program that ran during the License Term (as that term is defined in Trinity Exhibit 32) that featured a host or guest from Monroe, Georgia or Walton County, Georgia. Except for (1) the Praise The Lord programs where Bishop Earl Paulk and Dottie Rambo were interviewed (Paragraph 33 of TBN Exhibit 32), and (2) the programs described in Paragraphs 36-38 of Trinity Exhibit 32, Mr. Jackson is not aware of any program broadcast on WHSG-TV during the license term that featured a host or guest from the WHSG-TV service area.

3. Mr. Jackson cannot recall any program broadcast on WHSG-TV during the License Term that covered an event, issue or problem peculiar to Monroe, Georgia or Walton County, Georgia.

4. In the course of his ascertainment efforts, Mr. Jackson did not make any use of the Walton Tribune, a newspaper of general circulation in Walton County, Georgia and published in the county seat of Monroe, Georgia.

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5. During the relevant License Term, Walton County, Georgia maintained its own fire, police, water, sewage, hospital and public education systems separate and apart from those in Atlanta, Georgia.

6. In the course of interviewing community leaders for ascertainment purposes, Mr. Jackson does not recall interviewing any community leaders from Monroe, Georgia during the License Term. None of the community leader interview forms produced by Trinity indicate any interviews of community leaders from Monroe, Georgia or Walton County, Georgia.

7. Mr. Jackson and Mr. D'Amico began conducting ascertainment interviews of community leaders in September 1991, pursuant to instructions from Jane Duff's office at Trinity headquarters. In the third and fourth quarters of 1991, Mr. Jackson and Mr. D'Amico interviewed a total of seventy-five community leaders in each quarter because Mr. Jackson believed that was the number of community leaders that were supposed to be interviewed each quarter. By the first quarter of 1992, Mr. Jackson learned that only twenty-five community leaders had to be interviewed each quarter to be compliant with Trinity procedures, and that was the number of community leaders who were interviewed in the first quarter of 1992.

8. Every time a community leader, newspaper story, or other source mentioned an issue that was listed on the station's "Tabulation of Ascertainments" form, that mention would be noted. The total number of mentions of each issue from each source would

be tabulated. The issue with the greatest number of total mentions would be considered the most important issue, the issue with the second greatest number of total mentions would be considered the second most important issue, and so on. The tabulation for the third quarter of 1991 is submitted as Attachment 1 to this exhibit. The tabulation for the fourth quarter of 1991 is submitted as Attachment E to Trinity Exhibit 32. The tabulation for the first quarter of 1992 is submitted as Attachment 2 to this exhibit.

9. Mr. Jackson understood that he was to try to interview at least one or two community leaders in each of the nineteen categories listed in Attachment C of Trinity Exhibit 32. Initially, he understood that once that requirement was met, there was no additional requirement to spread out the remaining interviews among different categories of organizations. At some point during the License Term, Trinity headquarters told Mr. Jackson not to concentrate a large number of interviews in any one category of organizations.

10. As noted in Paragraph 11 of Trinity Exhibit 32, the printed media publications were not counted in determining the top issues in the fourth quarter of 1991. That omission was an oversight and not a conscious decision.

11. In the first quarter of 1992, state and federal government received a total of seventy-nine mentions, which was the second most number of mentions received by any issue. Trinity headquarters did not have any program that was responsive to that issue. Pursuant to instructions from Jane Duff's office, Mr.

Jackson did not list state and federal government as one of the top issues in the community because there were no programs responsive to that issue.

12. Mr. Jackson has no recollection of how viewers' phone calls were received or tabulated in connection with ascertainment during the first quarter of 1992.

13. Joy was a program that featured music as well as interviews.

14. The Earl Paulk Show, In Touch, and Changing Your World were all programs where the producers paid to have their programs aired on WHSG-TV and/or the Trinity Broadcasting Network. The Earl Paulk and In Touch programs were one hour in length, and Changing Your World was one-half hour in length.

**TRINITY CHRISTIAN CENTER OF SANTA
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ATTACHMENT 1

TRINITY BROADCASTING OF MONROE/ATLANTA
DESIGNATION OF TOP COMMUNITY PROBLEMS
FROM THE AVAILABLE SOURCES
IN THE CHANNEL 63
VIEWING AREA

JULY, AUGUST, SEPTEMBER 1991

GOVT/ STATE/ FED.	47
EDUCATION/ SCHOOL	41
HEALTH CARE	35
CRIME	19
SR. CITIZENS/ AGING	19
TRANSPORTATION	19

3rd Quarter, 1991

KTBN - CHANNEL 40
SANTA ANA, CA

TABULATION OF ASCERTAINMENTS

July, August, September

PROBLEMS/ ISSUES	RESPONSES FROM CIVIC LEADERS	PRINTED MEDIA PUBLS	T.V./ RADIO	VIEWERS' PHONE RESPONSES	S.A. CITY COUNCIL AGENDA TOTALS
ABORTION		2			2
AIDS	1 (1)	1			2
CHILD ABUSE	1 (1)				1
CHILD CARE		8			8
COST OF LIVING/INFLA- TION/POVERTY	1 (1)	4			5
CRIME	HH (5)	14			19
DRUGS/ALCOHOL ABUSE	HHH (6)	2			8
DISCRIMINA- TION/MINORITY	1 (1)	12			13
FAMILY/SINGLES	1 (1)				1
GOVT/STATE/FED	HHH (5)	2842			* 47
EDUCATION/ SCHOOLS	HHH HHT HH HH III (23)	18			41
HEALTH CARE	HHH HH HH HH HH HH II (27)	8			35
HOMELESS	1 (2)	1			3
HOUSING	HHH II (7)	11			18
IMMIGRATION					
POLUTION/ ENVIRONMENT	III (4)	5			9
SR CITIZENS/ AGING	HH HH HH (15)	4			19
TRANSPORTATION	HH HH I (11)	8			19
UNEMPLOYMENT	HHH (5)	5			10
YOUTH/GANGS	HHH III (8)	2			10
GAY RIGHTS					

POLUTION/ ENVIRONMENT	III	(4)	5		9
SR CITIZENS/ AGING	III IIII	(15)	4		19
TRANSPORTATION	III IIII	(11)	8		19
UNEMPLOYMENT	III	(5)	5		10
YOUTH/GANGS	III III	(8)	2		10
GAY RIGHTS					
WATER					
MARRIAGE/DIV					
GROWTH/POPULA- TION	III	(3)	5		8
HOMOSEXUALITY					
PORNOGRAPHY					
SEP OF CH/STATE					
APATHY			1		1

ATTACHMENT 2

TRINITY BROADCASTING OF ATLANTA
DESIGNATION OF TOP COMMUNITY PROBLEMS
FROM THE AVAILABLE SOURCES
IN THE CHANNEL 63
VIEWING AREA

JANUARY, FEBRUARY, MARCH, 1992

CRIME	135
EDUCATION/SCHOOLS	73
HEALTH CARE	56
DRUG/ALCOHOL ABUSE	55

WHSB -CHANNEL 63
MONROE-ATLANTA, GA

TABULATION OF ASCERTAINMENTS

PROBLEMS/ ISSUES	RESPONSES FROM CIVIC LEADERS	PRINTED MEDIA PUBLS	T.V./ RADIO	VIEWERS' PHONE RESPONSES	TOTALS
					S.A. CITY-COUNCIL AGENDA
ABORTION	0	6		0	6
AIDS	4	1		9	14
CHILD ABUSE	0	0		4	4
CHILD CARE	1	6		6	13
COST OF LIVING/INFLA- TION/POVERTY	2	12		2	16
CRIME	9	57		69	135
DRUGS/ALCOHOL ABUSE	8	27		20	55
DISCRIMINA- TION/MINORITY	1	25		4	30
FAMILY/SINGLES	1	2		4	7
GOVT/STATE/FED	2	66		11	79
EDUCATION/ SCHOOLS	11	54		8	73
HEALTH CARE	5	32		19	56
HOMELESS	6	4		24	34
HOUSING	0	13		2	15
IMMIGRATION	0	5		0	5
POLLUTION/ ENVIRONMENT	3	9		4	16
SR CITIZENS/ AGING	2	2		9	13
TRANSPORTATION	2	13		8	23
UNEMPLOYMENT	6	13		25	44
YOUTH/GANGS	5	12		0	17
GAY RIGHTS	0	2		0	2
WATER	0	7		0	7
MARRIAGE/DIV	0	1		4	5
GROWTH/POPULA- TION	0	0		2	2
HOMOSEXUALITY	0	0		0	0
PORNOGRAPHY	0	0		1	1
SEP OF CH/STATE	0	0		0	0
APATHY	3	0		3	6

VIEWERS'
PHONE
RESPONSES

STRAY ANIMALS	1
TAXES	4
TEENAGE SEX	8
WELFARE	2
LOW MORALS	4

**STIPULATION--TESTIMONY OF
LINDEE C. CONNOLLY**

Trinity Christian Center of Santa Ana, Inc. d/b/a Trinity Broadcasting Network (Trinity) and Glendale Broadcasting Company (Glendale) now stipulate that if Lindee C. Connolly were called to testify, she would testify as follows:

1. Mrs. Connolly does not recall any program that was broadcast on WHSG-TV during the License Term (as that term is defined in Trinity Exhibit 32) that featured a host or guest from Monroe, Georgia or Walton County, Georgia.

2. Mrs. Connolly does not recall any program that was broadcast on WHSG-TV during the License Term that covered an event, issue or problem peculiar to Monroe, Georgia or Walton County, Georgia.

3. Mrs. Connolly does not recall any specific instance during the License Term when she scheduled a public service announcement for the purpose of meeting a need or problem within the WHSG-TV service area.

4. The Joy program was thirty minutes in length, not one hour long as stated in Paragraph 11 of Trinity Exhibit 33.

5. A Call To Action and New Direction were not produced within the WHSG-TV service area during the License Term.

6. Feedback was produced by WHFT(TV) in Miami, Florida. In reviewing the topics and guests for that program, Mrs. Connolly would determine if the proposed program was responsive to an issue

Federal Communications Commission

Case No. 93-156 Exhibit 7E 6

Produced by Glendale

Disposition { Identification 5.17.94
Re 5.17.94

Reporter AN

Date 5.17.94